



# ASL SERVICES HOLDINGS, LLC.

GLOBAL VRS  
3700 COMMERCE BOULEVARD  
KISSIMMEE, FLORIDA 34741

Via Electronic and Overnight Delivery

August 30, 2017

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Received & Inspected

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

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AUG 31 2017

FCC Mailroom

RE: *Structure and Practices of the Video Relay Service program, CG Docket No. 10-51: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123, Notification of Substantive Change*

Dear Secretary Dortch:

Pursuant to Section 64.606(f)(2)(ii) of the Commission's rules, 47 C.F.R. §64.606(f)(2)(ii)), ASL Services Holdings, LLC dba GlobalVRS ("Global VRS") hereby notifies the Commission and TRS Fund Administrator that effective September 1, 2017, Global VRS is discontinuing service from, and closing, its call center located at [REDACTED]. GlobalVRS has determined that in light of changing geographic call origination, calls processed by this call center can be processed more efficiently by its other call centers. This closure will have no impact on the Company's continued compliance with the Commission's mandatory minimum standards.

**Request for Confidential Treatment. Request for Confidential Treatment.** Pursuant to Section 0.459 of the Commission's rules, and "Exemption 4" of the Freedom of Information Act, GlobalVRS respectfully requests that the call center location ("Confidential Information") be deemed confidential and protected, accordingly. Confidential Information provided in GlobalVRS' constitutes "trade secrets" as set forth in Section 0.457 of the Commission's rules, in that the Confidential Information reveals information regarding Company operations that would be useful to competitors. Further, the Confidential Information is not intended for public consumption. GlobalVRS would not otherwise make this Confidential Information publically available under any circumstance. Release of this Confidential Information to the public could cause GlobalVRS irreparable and inestimable harm.

GlobalVRS requests that the Confidential Information be withheld from public inspection, accordingly. Should disclosure of the Confidential Information be requested, GlobalVRS requests that it be informed of such request so that it may take appropriate action to safeguard its interests. In support of its request and pursuant to Section 0.459(b) of the Commission's rules, Global VRS states as follows:

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**1. Identification of the specific information for which confidential treatment is sought.**

GlobalVRS requests confidential treatment of the call center Confidential Information.

**2. Identification of the circumstances giving rise to the submission.**

GlobalVRS is providing this information in compliance with 47 C.F.R. §64.606(f)(2)(ii)).

**3. Explanation of the degree to which the information is commercial or financial or contains trade secret or is privileged.**

The Confidential Information constitutes highly confidential operations information that could be useful to competing entities. This information is safeguarded from competitors and is not made to the public accordingly.

**4. Explanation of the degree to which the information concerns a service that is subject to competition**

The Confidential Information involves video relay services, a highly competitive service served by an exceptionally limited number of providers.

**5. Explanation of how disclosure of the information could result in competitive harm.**

Disclosure of confidential operations-related Confidential Information could cause substantial competitive harm to GlobalVRS, because other video relay service providers would gain access to critical operations information and be able to assess the Company's organization, structure, and nature of its operations; information that would be useful in competing against GlobalVRS and undermine the Company's ability to compete in the provision of video relay services as well as video remote interpreting.

**6. Identification of any measures taken to prevent unauthorized disclosure.**

GlobalVRS has ensured that such Confidential Information is not disclosed to competitors, the public, or third parties.

**7. Identification of whether the information is available to the public and the extent to of any previous disclosures of information to third parties.**

Global VRS does not make the Confidential Information to the public or to third parties.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.**

This Confidential Information is being submitted by GlobalVRS. GlobalVRS requests that the Confidential Information provided in its response generally be treated as confidential indefinitely as the

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Company cannot identify a date certain by which this information could be disclosed without causing irreparable competitive harm to GlobalVRS.

In accordance with the Commission's May 31, 2012 Second Protective Order in the above-referenced proceeding, DA 12-858, an original and one (1) copy of this letter and attachment and two (2) redacted copies of this letter are enclosed. Two confidential copies of this letter have been sent via U.S. Mail to Mr. Eliot Greenwald, Consumer and Governmental Affairs Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 3-B431, Washington, D.C. 20554.

Pursuant to the Commission Disability Rights Office's May 7, 2012 guidance for submission of reports required by the telecommunications relay service rules, a confidential version, and separate public version are being submitted electronically to TRSreports@fcc.gov. A public inspection copy has been filed with in the Commission's electronic comment filing system.

Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

ASL SERVICES HOLDINGS, LLC

/s/ Gabrielle Joseph

Gabrielle Joseph  
Chief Operations Officer

cc: David Rolka, Rolka Loube Saltzer Associates (via electronic and RL extranet submission)  
TRSreports@fcc.gov